

Exhibit B – Document Production Format

1. Definitions

The following definitions apply to these instructions:

A. “**ESI**” or “**Electronic Document**” refers to information stored in electronic form including word processing files (*e.g.*, Microsoft Word), computer presentations (*e.g.*, Microsoft PowerPoint), spreadsheets (*e.g.*, Microsoft Excel) and email, together with the available metadata associated with each such document.

B. “**Native Format**” as used herein, means the default format of an Electronic Document created by its associated software program. For example, Microsoft Excel produces its output as ‘.xls’ files by default, which is the Native Format of Excel.

2. Production Format

Documents are to be provided in the native format in which they are maintained by the producing party.

A. Documents which are maintained electronically shall be produced electronically on an encrypted flash drive, hard drive, or via FTP, or another secure data transfer method. Documents that are maintained in paper format may be scanned and produced as a .pdf.

B. Where documents with attachments are produced, they shall be attached in the same manner as included in the original file.

C. Where documents are produced and all attachments thereto are not included, the producing party shall identify the missing attachments by means of a “place holder” file, and explain the reason for their non-production.

D. Documents that are segregated or separated from other documents, whether by inclusion of binders, files, dividers, tabs, clips or any other method, shall be produced in a manner that reflects these divisions.

E. Where the producing party converts paper documents into electronic format, distinct documents must not be merged into a single record, and single documents must not be split into multiple records (*i.e.*, paper documents must be logically unitized). In the case of an organized compilation of separate documents – for example, a binder containing several separate documents behind numbered tabs – the document behind each tab should be scanned separately, but the relationship among the documents in the compilation should be reflected in the proper coding of the beginning and ending document and attachment fields.

F. Media files (e.g. .mp3, .wmv, etc.) shall be produced in Native Format with a single placeholder image bearing the relevant Bates number and confidentiality designations.

G. Contact the receiving party to discuss a suitable production format for any proprietary or non-standard file types that require special software or technical knowledge for review, Databases or Database reports, or any data not covered by the technical specifications in this protocol. This includes data collected from collaboration and chat applications such as Slack, Microsoft Teams, Jira, mobile device data, etc.

H. **Metadata.** The Parties will not alter metadata of documents to be produced. The Parties will not “scrub” Metadata before production and to the extent possible Metadata will be included for all documents produced in the format in which they are maintained by the producing party.

3. Documents Protected from Discovery

Documents that contain both privileged and non-privileged information shall be produced with the privileged information redacted in such a way as to show the location of the redaction within the Document.